

Crystal L. Cox
Investigative Blogger
Pro Se Defendant
Oregon Civil No. CV 11-0057 HZ

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
Portland Division

OBSIDIAN FINANCE GROUP, LLC and
KEVIN D. PADRICK, Plaintiffs

Civil No. CV 11-0057 HZ

CRYSTAL L. COX, Defendant

**Defendant's Memorandum in
Support of Objection to Motion to Compel
and Demand for Jury Tampering Investigation**

Pro Se Defendant Crystal L. Cox Suspects that Obsidian Finance Group has had past contracts, connections, and affiliations with Joseph Whittington, Whittington Consulting, Marquee Media of Washington and is connected to Joseph Whittington, Joe Whittington Juror in conspiracy against Pro Se Defendant Crystal Cox.

Joseph Whittington did not disclose ALL his businesses, connections, and possible conflicts of Interest to Pro Se Defendant, Crystal Cox, at the time of the Trial. Thereby not giving Pro Se Defendant, Crystal Cox fair and just information to base decisions on as to what questions to ask or objections to make on Joseph Whittington being a Juror in Obsidian Finance Group V. Crystal L Cox, Pro Se Blogger.

The Following is Reasons that Pro Se Defendant Crystal L. Cox Suspects undisclosed Juror Connections, Undisclosed relationships, Undisclosed contracts, and in effect Jury Tampering.

Juror Number 11, Joseph Whittington is connected to **Marquee Media of Washington**, a Media Brokerage in Oregon, which was undisclosed at the time of Obsidian V. Cox. And Joseph Whittington is Connected to John Whittington Consulting, which was undisclosed to pro se defendant Crystal L. Cox.

In internet directories Joseph Whittington has the email

joe.whittington@whittingtonconsulting.com, and the web address listed as WhittingtonConsulting.com. The contact information for Whittington Consulting LLP, and Joe Whittington per the Oregon Secretary of State is the Same as the Contact information for Sahale Travel, and Oregon Peak Adventures.

At the time of the trial Joseph Whittington said that his wife was a retired travel agent and he was a mountain guide. These Travel and Mountain Guide Services have connections to Sahale Enterprises, and Whittington Consulting. Here is what Joseph Whittington disclosed at time of Trial.

Per Court Trial Transcripts

Joe Whittington, Juror Number 11 Said :

"JUROR NO. 11: Good morning. My name is Joe Whittington. I live in Beaverton, Oregon with my spouse. My current occupation is a mountain guide. I own a guide service, and we do international trips, mostly to Nepal and China, Tibet. My wife is a retired travel manager. Both my wife and I have several degrees. I belong to American Mountain Guides Association, Mazamas, American Alpine Club, Mt. Hood Miata Club. And hobbies, I like climbing, backpacking, snow sports, reading, photography. And I was called as a juror in Washington County, but was dismissed. "

Judge Marco Hernandez asked all Jurors, per transcript if they had knowledge or connection to the Plaintiff, to the Summit Bankruptcy, to Patricia Whittington, or anyone regarding this case and none was disclosed.

Pro Se Defendant Crystal Cox believes, **Marquee Media of Washington**, and **Whittington Consulting**, has had contracts with Plaintiff in regarding to Solar Farms in Christmas Valley Oregon in conjunction with Plaintiff's Owned Solar Companies (Outback Solar, Obsidian Renewables, Sage Renewables, Lost Forest Solar LLC) Plaintiff is a high profile Solar Company getting millions in Solar Tax Credits from the State of Oregon via many Solar Companies under the name David W. Brown with the Registering Agent Service Miller Nash, same address as Brian B. Doherty, Lobbyist for High Profile Public Figure David Brown, Kevin Padrick and Obsidian Finance Group.

Reasons Pro Se Defendant Crystal Cox Believes Joseph Whittington, Presiding Juror is conflicted are as follows:

I Stumbled on a Few things Regarding Joseph Whittington, while researching connections of Patricia Whittington, and Cascade Medical Center, St. Charles Health System, Sageview Bend Oregon and Jim Diegal CEO, as to connections I have writing on for years regarding St. Charles Hospital in Bend Oregon with conspiracy to silence a whistle blower and also researching these connections for a future HIPAA Violations legal action against Patricia Whittington, Obsidian Finance Group and David Aman Tonkon Torp regarding medical records being illegally obtained, in regard to, and outside the jurisdiction of, the Summit Accomodators / Summit 1031 Bankruptcy.

For over 5 years I, Pro Se Defendant Crystal L. Cox, have been deeply investigating

on the Internet, in regard to many high profile bankruptcy cases and court corruption around the United States. For 3 years I have been gathering evidence, creating notes, taking interviews, reviewing depositions, videos and documents, reviewing financial documents, reading insider emails, reading court documents in my investigative blogging on the Summit Bankruptcy and the Illegal Actions of Bankruptcy Trustee Kevin Padrick in conspiracy with Judge Randall Dunn, Pamela Griffith of the Department of Justice, Miller Nash, Steven Hedberg Perkins Coi Law Firm, Sussman Shank Law Firm Susan Ford and Tom Still and Tonkon Torp David Aman and Leon Simson. And recently In this research of Cascade Health Community, and the Connections with Sageview, St. Charles and Patty, Patricia Whittington of Obsidian Finance Group I searched this Internet search term, **"www.scmc.org whittington "**.

I am telling the court in this detail to show that I was not seeking to investigate a juror, I had believed that jury was not involved and simply did not have enough information on Obsidian Finance Group or the Summit Bankruptcy and that is why they all voted guilty and even awarded more then the Plaintiff asked. All on the "Opinion" of one Oregon CPA and lies about my "intentions" believed by the jury.

I had noticed that Patty Whittington was on the board of Cascade Health Communities at one time, and this is a very big deal as during the Summit Bankruptcy there was extraordinary methods taken by the Bend Police, Bend DA and St. Charles Medical Center (Cascade) to STOP an insider, a whistle blower from talking to me, investigative blogger Crystal Cox.

And there were deals made regarding speaking to me, an investigative journalist which was not based in mental health or medicine and is illegal.

Also there were medical records released which violates HIPAA, and there was seemingly a mystery as to how David Aman, Tonkon Torp and Kevin Padrick Obsidian Finance Group got these records.

So, when I discovered that Patty Whittington was on the board of Cascade Health Systems, I became very interested in researching further, and in searching the term **"www.scmc.org whittington", as stated above**, I noticed this link near the bottom of the page:

" CHRISTMAS VALLEY | Oregon U.S. Business Directory Library (OR ...
 or.bizdirlib.com/category/city/CHRISTMAS_VALLEY?page=5
joe.whittington@whittingtonconsulting.com. ADDRESS: ...
 scmcf@scmc.org. ADDRESS: ...
 STCHARLESFOUNDATION.COM^^STCHARLESFOUNDATION.ORG ..."
(See Attached Exhibit 1)

After investigating Obsidian Finance Group for over 3 years I noticed **Christmas**

Valley, as that is where the **Obsidian Renewables, Outback Solar Project** is and that is where the Lake County Concerned Citizens are that have great issues with Todd Gregory David W. Brown and Obsidian Finance Group. And this is the location of the BETC, Oregon Tax Solar Credits where Obsidian Finance Group as Obsidian Renewables tried to get 50 Million in Solar Tax Credits, when they were only legally entitled to 10 Million. This was and is a major public concern and has been in many news outlets, as well as Obsidian Finance Group sued the State of Oregon which cost public tax dollars and is of a public concern.

This all connects, so the Christmas Valley connection with St. Charles grabbed my eye and then I noticed "Joe Whittington" and realized that he was one of my Jurors in Obsidian V. Cox and he was the "Presiding Juror". From Exhibit 1 above we see the listing for **Marquee Media of Washington and the contact information as Joe Whittington**

Marquee Media of Washington

Media Brokers

503-297-6344

Christmas Valley

Joe Whittington - **Email:** joe.whittington@whittingtonconsulting.com

Website - <http://whittingtonconsulting.com/>

Juror number 11, **Joe Whittington** never mentioned being a Consultant for an online marketing firm nor having any expertise in this field.

In order to be sure this is it the same Joe Whittington that was the Presiding Juror in Obsidian V. Cox? I googled the phone number (503-297-6344), in the directory in Exhibit 1 and found this...

SAHALE TRAVEL

7840 SW WALNUT LN

PORTLAND, OR 97225-3822

503-297-6344

SAHALE ENTERPRISES, INC.

SAHALE TRAVEL

7840 SW WALNUT LN

PORTLAND, OR 97225-3822

503-297-6344

Source of above

http://apps.beavertonoregon.gov/BusinessSearch/category_results.aspx?cd=7139

(**Exhibit 3** Attached to this Memorandum to Motion to Compel Regarding Suspected Jury Tampering.)

Joseph, Joe Whittington said he and his wife had a travel agency, yet he did not

mention anything else other than a guide for trails, hiking and such. This Same Joseph Whittington Owns Whittington Consulting LLC according to the Oregon SOS, Exhibit 2, as it is a Joseph C. Whittington at the same address as the above businesses. As Seen in **Exhibit 2** attached to this Memorandum, and Motion to Compel.

We also see in Exhibit 1 that **Marquee Media of Washington, with website Whittington Consulting, and email joe.whittington@whittingtonconsulting.com that the SIC Code & Description for Marquee Media of Washington is 731304,** which is (Media Brokers), in Oregon Law.

Marquee Media of Washington is a "Media Broker" and the contact is Joe Whittington of WhittingtonConsulting.com, **Marquee Media of Washington** has no listing in the Oregon SOS site, nor the Washington SOS Site, though this business is listed in Oregon Directories, however the contact information for Marquee Media being Joe Whittington of Whittington Consulting, we do see Whittington Consulting in another online Oregon directory as show in **Exhibit 4** attached to this motion. Which Says:

Whittington Consulting

- **Company Name:** Whittington Consulting
- **SIC Code:** 871111
- **SIC Description:** Engineers
- **Phone Number:** 503-297-6344 (+1-503-297-6344)
- **Fax Number:** 503-292-1686 (+1-503-292-1686)
- **Web Address:** WHITTINGTONCONSULTING.COM
- **Email:** joe.whittington@whittingtonconsulting.com
- **Country:** U.S.A. - United States
- **State:** OR - Oregon
- **City:** PRAIRIE CITY
- **Address:** 7840 SW Walnut Lane
- **ZIP Code:** 97224"

Source

http://or.bizdirlib.com/category/city/Prairie_City

(Exhibit 4 filed with this Motion)

Whittington Consulting LLC in Oregon is owned by Joseph C. Whittington as we see in Exhibit 2, and the same phone number as listed in the directories goes to the Same Joe Whittington of Sahale Travel and other companies listed above, however the website in the directory, WhittingtonConsulting.com as shown in Exhibit 5 has a "John Whittington Consulting" and a MO phone number and address. I suspect this may be the father of Joseph C. Whittington, of Marquee of Washington, of Sahale Enterprises, Sahale Travel, and Whittington Consulting of Oregon. Even if not related, this is an affiliation that Juror 11 Joe Whittington did not disclose and this Whittington Consulting says this about it's business:

"Whittington Consultingt is a results-oriented, **professional management and marketing firm providing consulting services** to both domestic and international businesses.

During 30-plus years of working as a consultant, John Whittington has provided clients with his **expertise in operational management, marketing, corporate partnering, business investor funding and coordinating development** for physical elements of projects.

Mr. Whittington is **one of the nation's leading corporate partner consultants in the development and sales activity of corporate partner programs, acquiring several million dollars in funding value for his clients.**

His sales efforts in corporate partnering have produced fee values from five figures to several million dollars.

Business investment funding values ranged from lower six figures to several hundred million dollars for his clients. Mr. Whittington offers a unique background in management, marketing, promotions, planning, investment funding and human resource disciplines. For many years **he has successfully brokered products and services to an impressive array of major companies."**

As seen in **Exhibit 5, WhittingtonConsulting.com**

This is a connection that Pro Se Defendant Crystal L. Cox claims she had a right to know before trial Obsidian V. Cox. Pro Se Defendant Crystal L. Cox also believes that Whittington Consulting has had contracts of some kind with Plaintiff in some way.

Pro Se Defendant Crystal L. Cox, knows this to be **John D. Whittington** as web archives of this same website **WhittingtonConsulting.com**, Show the title of the Website Being, Whittington Associates and this version shows a client list which is not shown in the current website version. This is **Exhibit 6** at the folling web link <http://web.archive.org/web/20110208040906/http://whittingtonconsulting.com/>

Pro Se Defendant Crystal L. Cox believes this John D. Whittington Consulting, Whittington Consulting LLC, Whittington Associates in connection to Christmas Valley Oregon where Obsidian Finance Group has Obsidian Renewables, the Outback Solar Project, to be connected to the Plaintiff in Obsidian V. Cox.

We see Sahale Enterprises, Inc above, as in **Exhibit 8**, the SOS Listing for Sahale Enterprises and in Exhibit 7 and Exhibit 3, why did Joseph C. Whittington not disclose that he was a "principal" of a Sahale Enterprises Inc.?
<http://www.manta.com/c/mr4t6d2/sahale-enterprises-inc>
(Exhibit 7)

To Learn more about "John Whittington Consulting", I googled this number,(417) 831-4755 and I find John Whittington Associates Springfield MO. The MO SOS site shows Whittington Associates, **Exhibit 10, 10 A, and 10B** as registered to John D.

Whittington and Novella M. Whittington.

John Whittington is a Marketing Consultant, Joseph Whittington, juror did not disclose this, nor a relation of any kind to a John D. Whittington of Whittington Consulting which seems to be a company that brokers very high dollar deals. Pro Se Defendant Crystal L. Cox claims she had a right to this knowledge. Pro Se Defendant Crystal L. Cox also claims that Patricia L Whittington of Obsidian Finance Group, is related to Joseph C. Whittington somehow, and that Joseph Whittington had past financial connections, contracts with the Plaintiff in some way.

Whittington Enterprises Incorporated, as shown in Exhibit 11 is registered to the same John D. Whittington as shown at the MO Secretary of State website. Whittington Enterprises Incorporated, is registered to a John Whittington, 3538 Cooper Boulevard. And as shown in **Exhibit 11A** - This SOS Listing has the officers listed as John Whittington, Novella Whittington, Jeffrey Whittington, Mark Whittington. Jeffrey Whittington is believed to be the husband of Plaintiff's VP Patricia Whittington.

WhittingtonConsulting.com is registered to Michael Brockett. And the site goes to a John D. Whittington in Springfield MO. With connections to Joe Whittington Marquee Media of Washington in a Christmas Valley directory listing, with the email Joe.Whittington@WhittingtonConsulting.com - Whittington Consulting LLC in Oregon is registered to Joe, Joseph Whittington.

"Registrant:

Michael Brockett

Michael Brockett

R3 Box 75-1 P.O. Box 283

Cleveland, OK 74020

US

Phone: +1.9186303978

Email: michael@kidsonfirst.com

Registrar Name.....: Register.com

Registrar Whois....: whois.register.com

Registrar Homepage: www.register.com

Domain Name: whittingtonconsulting.com

Created on.....: 2003-11-11

Expires on.....: 2012-11-11"

Sahale Travel is active and it's registry date is 6-02-2010. The Address of the Principal Place of Business is **7840 SW Walnut Lane Portland Oregon 97225**. Authored

Representative is **"Sahale Enterprises**, Reg. Number 662061 7840 SW Walnut Lane. The Registrant is **Joseph Calhoun Whittington** at **7840 SW Walnut Lane Portland Oregon**. Filed in these three counties: Clackamas, Multnomah, Washington.

This was a disclosed type of business and has the same phone numbers as the undisclosed businesses.

See **Exhibit 9** for Oregon SOS on Sahale Travel

Pro Se Defendant Cox claims a conflict of interest with Judge Hernandez knowing that Joseph Whittington was head juror before it was told to him, as shown in court transcripts where Judge Hernandez, yes, claims he noticed the paper in Joe Whittington's hand, however Pro Se Defendant Crystal Cox believes that Judge Hernandez may have known ahead of time that Joe Whittington would be the presiding Juror.

Pro Se Defendant Crystal Cox has asked Judge Hernandez to sign a conflict of interest disclosure form from her first response to this court and has been denied time after time.

Pro Se Defendant Crystal Cox attaches the same Conflict of Interest form to yet another motion to this court.

Exhibit 12 Shows Dates of Judge Hernandez's Appointment After Obsidian V. Cox was Filed and Showing endorsements by Sen. Gordon Smith and Democrat Sen. Ron Wyden, both of whom are connected to Obsidian Finance Group by Campaign Contributions and by William Smith Properties Bend Oregon recommending Obsidian Finance Group to Summit Accomodators and being a top contributor to both Sen. Gordon Smith and Democrat Sen. Ron Wyden.

"Senate unanimously approves Marco Hernandez to be federal judge Published: Monday, February 07, 2011, 2:51 PM "

Exhibit 12

http://www.oregonlive.com/politics/index.ssf/2011/02/senate_unanimously_approves_ma.html

Pro Se Defendant Crystal Cox believes Judge Hernandez to be in undisclosed conflict with Plaintiff, and Or Plaintiff's Attorney or those who benefitted from actions surrounding Kevin Padrick's role as Trustee in the Summit Bankruptcy.

Pro Se Defendant Crystal Cox asks did Judge Hernandez know all the jurors name, as when **Joseph Whittington** was called by name to give the verdict, as shown in court transcripts, then Judge Hernandez said, oh I see you have the paper in your hand so I presumed you were the presiding juror? Did Judge Marco Hernandez know Joseph Whittington? Did Judge Hernandez know that Joe Whittington would be the Presiding Juror? Pro Se Defendant Crystal Cox, has the right to question these actions and to have a fair and unbiased trial.

Also note connections to Elite Portland Law Firms, and the date's that Judge Hernandez

was appointed, much later then this case was filed. Defendant was denied a reason as to why Judge Ancer Haggerty was removed from this case.

Perkins Coie paid for a Luncheon welcoming Hernandez, and Perkins Coie is in serious Conflict in what Pro Se Defendant Crystal L. Cox is exposing in her investigative blogging over 3 years regarding the Summit Accomodators Bankruptcy. As seen in Exhibit 13.

Judge Hernandez claimed in a Motion to Exclude Sean Boushie that he was turning information over to the FBI in regard to intimidating me, a Defendant in a Federal Court Case, and the connection to Plaintiff's Attorney intimidating me was made clear.

After this phone hearing, Motion to Exclude Sean Boushie, Plaintiff Attorney, David Aman notified the man he was connected to in Montana, Sean Boushie and Sean Boushie dropped his 3 year hate blog threatening me.

Again, I ask this court if is legal to post an audio of this hearing, as my life is still threatened and I am constantly intimidated by Sean Boushie working in conjunction with Plaintiff David Aman, and Kevin Padrick.

Judge Hernandez did not seem to take this threat seriously as David Aman was involved, and I have been in fear of my life of this situation yet Judge Hernandez discriminates against me and forces a \$5000 payment to David Aman for a Montana Deposition in which I was not served, nor court ordered to attend and in which I knew that My Stalker would be in the area and was connected to the Plaintiff and I feared for my life, still I am denied my equal rights, civil rights, constitutional rights and human rights.

I was discriminated against in discovery as Judge Hernandez ruled that I was to give years of emails, phone records, contact information with business associates, past clients and employees, which was unrelated to the post I was on trial for, and violated my constitutional rights and yet, though Plaintiff gave me, Pro Se Defendant, less then 1% of what I asked for in discovery which was to prove or disprove tax fraud and was related and Judge Hernandez did not require them to give me that same respect, to give me equal protection under the law and due process.

The day before the Trial Judge Hernandez told Plaintiff's attorney that David Brown, Obsidian Finance Group Principal, could not testify as to a stated loss, that, this was hearsay and that David Aman would have to bring the Bank VP in as a witness, he gave Aman another night to call a witness, I was not given this same opportunity. And also this Bank VP did not show up, and the very next day David Brown and Obsidian Finance Was allowed to simply state a loss of millions with no witness and no documented proof. Plaintiff simply claimed that from the time of the Post of Dec. 25th 2010 to the time of the court filing Jan 14th 2011, 20 days later and over the busiest holiday of the year, Plaintiff simply stated they lost millions and that was taken as fact.

I brought over 547 pages to this trial to show my source, and Judge Hernandez threw this information out saying it was hearsay, this again was double standards, discrimination and not based in rule of law equally the same for both parties.

The one Exhibit I did get into the Court Proceeding, as you see per the Transcripts was the Summit Contract proving that Kevin Padrick was an insider and not legally allowed to be a Trustee, and when I submitted this Judge Hernandez asked David Aman if he Objected, though I was Pro Se and it was my first time, I was never asked if I objected to anything, again discrimination and denial of due process.

The day of my deposition, there, judge Hernandez ordered me to disclose where I went to school and about my search engine business and this was off the record with no transcription, again denial of rights and due process.

Clients have told me that Kevin Padrick and Reporter Jeff Manning have connected them in regard to deposits made in my bank accounts, of which was obtained illegally by Kevin Padrick. Even though a 2.5 Million Judgement has been entered against me, Kevin Padrick and Reporter Jeff Manning, along with the New York Times David Carr, and Forbes Katrina Hill, are ruining my online business and preventing me from making a living.

Attached is Conflict of Interest Form and Exhibit 1 through 13, as well as Motion to Compel Regarding Suspected Jury Tampering. And Supporting Memos.

Pro Se Defendant

Crystal L. Cox

February 6th 2011.

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **Defendant's Memorandum in Support of Motion to Compel Jury Tampering Investigation** to Plaintiff Attorney David Aman, Tonkon Torp At the Following Email Addresses, on February 13th 2011:

To:

mary.costanzo@tonkon.com

david.aman@tonkon.com

steven.wilker@tonkon.com

With a Copy to the Oregon Courts and Electronic Filing

Cc: Michelle_Rawson@ord.uscourts.gov

Crystal L. Cox
Defendant Pro Se
Civil No. CV 11-0057 HZ